

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

HERTZ SCHRAM, PC,

Civil Action No. 12-cv-14234  
Hon. Mark A. Goldsmith

Plaintiffs,

v.  
FEDERAL BUREAU OF  
INVESTIGATION,

Defendant.

HERTZ SCHRAM PC  
Howard Hertz (P26653)  
Elizabeth C. Thomson (53579)  
1760 South Telegraph Road, Suite300  
Bloomfield Hills, MI 48302  
(248) 335-5000  
[hhertz@hertzschram.com](mailto:hhertz@hertzschram.com)  
[lthomson@hertzschram.com](mailto:lthomson@hertzschram.com)

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Assistant United States Attorney  
Attorney for Defendant  
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**PLAINTIFF'S LAY WITNESS LIST**

NOW COMES Plaintiff, Hertz Schram PC, ("Plaintiff") through its attorneys, Hertz Schram, PC and states the following as its' Lay Witness List:

1. Elizabeth C. Thomson, attorney.
2. As yet unidentified past or present officers, directors, employees, contractors or agents of Defendant, who have knowledge and information regarding the claims at issue in this case.
3. As yet unidentified individuals, agents, officers, employees of governmental agencies, police, border patrol or other law enforcement agencies who may possess information, facts, documents or knowledge regarding the claims at issue in this case.

LAW OFFICES HERTZ SCHRAM PC

4. As yet unidentified past or present officer, directors, employees, contractors or agents of Defendant, who have knowledge and information regarding the 2011 FBI publication, "2011 National Gang Threat Assessment: Emerging Trends."

5. As yet unidentified past or present officers, directors, employees, contractors or agents of Defendant, who have knowledge and information regarding the FOIA requests made by Hertz Schram PC to Defendant and the documents produced by Defendant.

6. Bill Dail, Psychopathic Records, c/o Hertz Schram PC.

7. Any and all witnesses listed on Defendant's Witness List, regardless of whether called by Defendant to testify at the time of Trial.

8. Any and all individuals identified in Answers to Interrogatories, Responses to Request for Production of Documents and Answers to Request for Admissions.

9. Any and all individuals identified during the course of discovery in this matter.

10. Any and all individuals identified during depositions taken in this matter.

11. Any and all necessary rebuttal witnesses.

12. Plaintiff reserves the right to amend its Witness List to add additional lay witnesses as they become known through the course of further discovery.

Respectfully submitted,

Hertz Schram PC

By: /s/ Elizabeth C. Thomson  
Howard Hertz (P26653)  
Elizabeth C. Thomson (P53579)  
Attorney for Plaintiffs  
1760 S. Telegraph, Suite 300  
Bloomfield Hills, MI 48302-0183  
(248) 335-5000

Dated: April 22, 2013

**CERTIFICATE OF SERVICE**

I hereby certify that on April 22, 2013, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to all ECF participants.

/s/ Elizabeth C. Thomson

Howard Hertz (P26653)

Attorney for Plaintiffs

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